U.S. General Services Administration

July 28, 2026

Ms. Nancy Herter
Director, Technical Preservation Bureau
New York State Historic Preservation Office / OPRHP
P.O. Box 189 Waterford, NY 12188

Attention: Lisa Petruzzelli

Re: Courthouse Hardening & Interior Renovation, Kenneth B. Keating FOB & USCH
100 State St, Rochester, NY 14614

Dear Ms. Herter,

GSA previously initiated consultation on an undertaking focused on the improvement of interior space of the former post office. Since initiating that consultation, GSA has recently been informed of additional proposed projects and would like to expand the consultation to reflect all proposed projects and make a determination of effect that accurately considers cumulative impacts to the building and historic district. The U.S. General Services Administration (GSA) is initiating consultation on proposed security improvements to the building and site and renovation of the former post office space in the interior of the Kenneth B. Keating FOB & USCH (FB) (undertaking) in Rochester, NY. The FB was listed in the National Register of Historic Places (National Register) in 2024 as a contributing element in the Four Corners-Genesee Crossroads Historic District (HD) (NR #100010188). This proposed action qualifies as an undertaking pursuant to 36 CFR 800.16(y) implementing regulations for the National Historic Preservation Act. The area of potential effect (APE) for this undertaking is the limits of the HD.

Exterior Improvements
The proposed exterior undertaking consists of replacing and installing new 8’ fencing around the building, modifying pavement and curbs, replacing pedestrian gates with new gates, landscaping and storm drainage as needed for the project, installing interior security glazing on the windows, installing four new windows above the main entry to the connecting lobby, and security system and electrical work.

Phasing and work plan (Attachment 1):

1. Fencing: The adjoining parking lot at the rear of the building was previously subdivided into discrete sections with a fence around the perimeter. The

proposed project calls for the installation of a higher fence and the addition of an interior fence to separate the two parts of the parking lot. This will allow for a secured parking area that connects directly to the loading dock and a discrete entrance to the rental agency's section of the building. Installation of a new 8' fence around the parking lots (where it does not already exist), will allow the front fence along State Street and Andrews Street to remain lower. The fence updates are essential for security and therefore mission critical.

For security reasons the parking lot needs to be surrounded by an 8 foot high anti-scalable trident fence. Most of the existing fence is already 8 feet tall, any area that is not yet 8 feet tall will be brought up to 8 feet and the new dividing fence will also be 8 ft high. The dividing fence is proposed to be installed down the center of a raised curb. The footings will extend 4 ft below grade and be one foot wide. Archeologically this is a highly disturbed area and it is extremely unlikely that any historic material will be discovered during the very limited and contained ground penetration. None-the-less, as is our standard, GSA will include monitoring guidelines with stop work ability and clear reporting instructions should anything be discovered, at which point GSA HP will contact NY SHPO Archeology immediately to discuss the discovery and next steps.

2. Paving and Gates: Modify existing pavement to close gaps under the fence which are currently large enough for an individual to crawl through. North Side along Andrews Street at Gates 1, 2, 3, and 4: Remove existing sensors and install new buried magnetic sensors at Gates 1, 2, 3, and 4. Replace the non historic existing pedestrian gates with new security gates. All work will be performed in previously disturbed soil.

3. Windows: Interior security glazing system will be installed along the north, west and south sides of the first floor of the building. The new glazing system will be secured by drilling into the existing interior frame. The Security Glass to be used is ArmorPlast AP375 for forced entry and containment as manufactured by Riot Glass (Attachment 4: Data Sheet).

4. Four New Windows: Four new aluminum-framed windows will be installed in the existing metal spandrel wall system above the main entry to the connecting lobby. The windows will follow the rhythm/spacing of the panel design. They are necessary to bring daylight into office space that currently has no natural light source.

5. Exterior Louvers: Three louvers will be installed in the exterior wall of the building and will be visible only from the rear of the building by the employee parking lot. Two louvers will measure 18"W x 18"H and one will measure 24"W x 18"H. This scope was included in the prior submission.

6. Loading Dock: The loading dock will remain as is, but a new ramp will be installed and the stairs will be repaired. Separate loading docks stretch along the

length of the building. The work is being performed to only one discrete area of the loading dock and was included in the prior submission.

Interior Improvements

The proposed renovations of the former Post Office Space were previously submitted to your office under Reference number DAX66L6JRQG8. This work is being performed to backfill the space for a new Federal Tenant (United States Border Patrol). The proposed interior undertaking is planned for the former post office service lobby, PO box lobby and the mail sorting room; these spaces have been extensively altered over time and retain little of their original finishes. The main decorative lobby will not be affected by this work.

The project includes the encapsulation of the concrete honeycomb ceiling in the mail sorting room. The ceiling has many penetrations where lighting fixtures, vents, etc have been attached, the existing ceiling will remain intact above a new drop ceiling. The existing half brick walls will remain and be encapsulated with drywall.

The terrazzo flooring will remain intact in the lobby spaces. The existing mailboxes will be removed during the project. It is unclear if they are original to the building; they are installed in a non-original partition wall without finished edging. The mailboxes are non-functional.. The existing double doors will be replaced in kind; updated drawings will be provided.

Section 106 Consultation

A list of Native American tribes has been obtained through the New York State Department of Environmental Consultation, Indian Nation Affairs. GSA is contacting the identified tribes and organizations to determine if any attach significance to the areas within the APE or would like to participate in this consultation. GSA will invite the Advisory Council on Historic Preservation to participate in this consultation separately, and will notify your office of the response. Other consulting parties include the U.S. Customs and Border Protection, Albany Historic Resources Commission, Historic Albany Foundation, and the Preservation League of New York State. GSA will consult the public through these local consulting parties. Per 36 CFR 800.3(f), If you have any additional suggestions for consulting parties that should be invited to participate, please let us know.

Any other reports or surveys

There are no additional reports or surveys related to the project site or any adjacent site.

GSA has reviewed the proposed undertaking and per 36 C.F.R. § 800.5(a)(1) applied the criteria of effect. The undertaking may have an adverse effect on historic properties due to the insertion of four new windows in the front facade; changing the historic appearance of the building. GSA has determined the undertaking will not impact the HD's significance and eligibility for listing in the National Register, but it does have the potential to affect the historic fabric of an individual contributor to the HD. **Pursuant to**

36 C.F.R. § 800.5(b), GSA has determined the undertaking may have an Adverse Effect on Historic Properties and would like to consult with your office on ways to avoid, minimize, or mitigate potential adverse effects.

Please review the enclosed documentation. By copy of this letter, GSA is notifying interested parties of the proposed Undertaking, our determination of an adverse effect, and soliciting any comments they may have at this point in the process. GSA looks forward to consulting with your office on the undertaking and If you have any questions, please contact me at avigail.charnov@gsa.gov or (202) 655-7663.

Sincerely,

Avigail Charnov

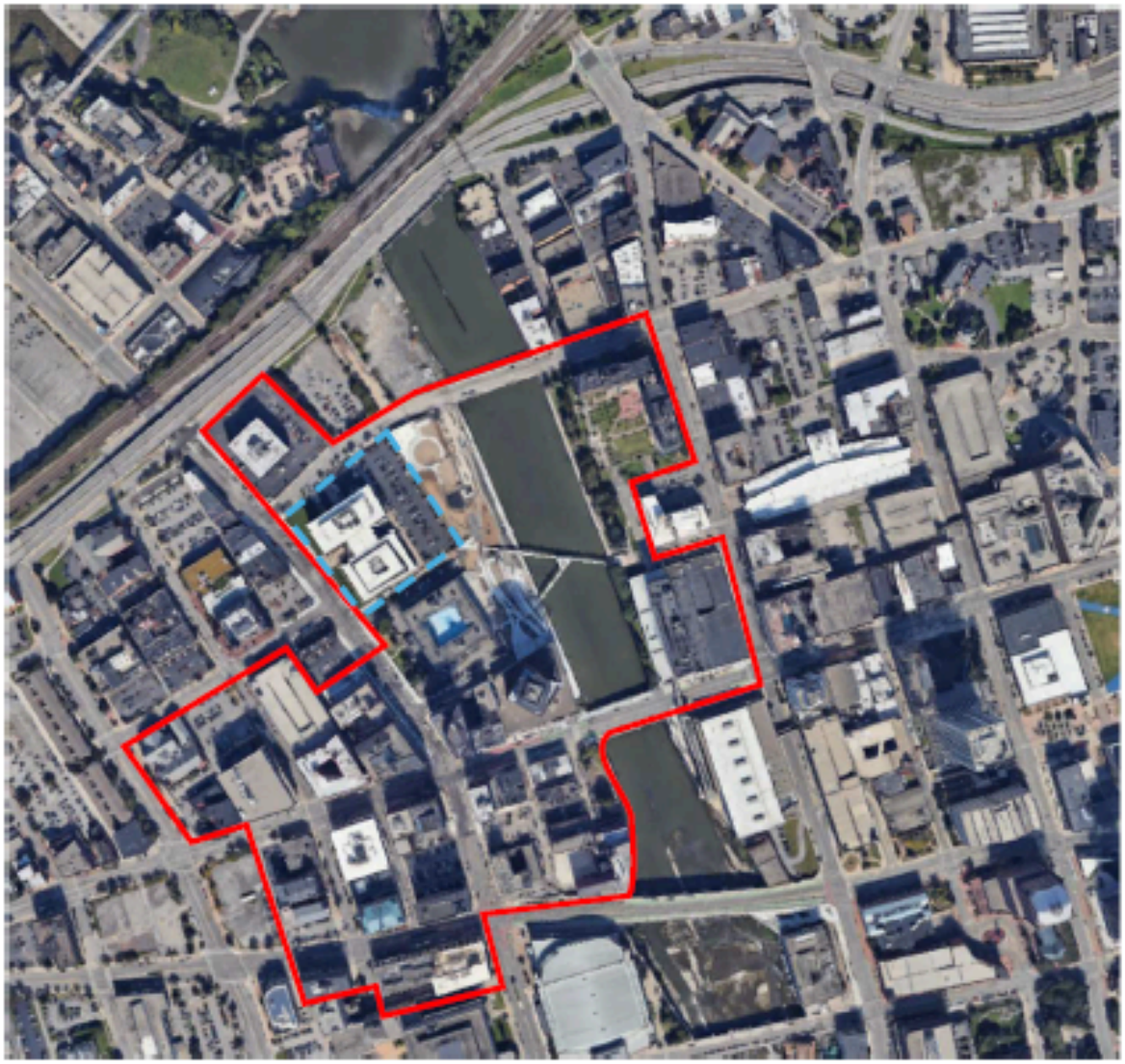
Avigail Charnov
Historic Preservation Specialist / Architectural Conservator
Historic Buildings Branch
U.S. General Services Administration

Enclosures: APE Map, Photos, Plans, Data Sheet

CC VIA EMAIL:
Kristi Tunstall Williams, Federal Preservation Officer, GSA
Sharon Feeney, Historic Preservation Branch Chief, GSA
Peter Smith, Project Manager, GSA
Laura Lavernia, Historic Preservation Program Manager, CBP
Lauri Regan, Environmental Specialist, CBP
Albany Historic Resources Commission, CLG
Office of Indian Nation Affairs
Historic Albany Foundation
Preservation League of New York State

Attachment 1
Area of Potential Effect & Project Area

Area of Potential Effect



Area of Potential Effect: Four Corners-Genesee Crossroads Historic District

Kenneth B. Keating Federal Building Site

Attachment 2
Photos











Attachment 2
Photos

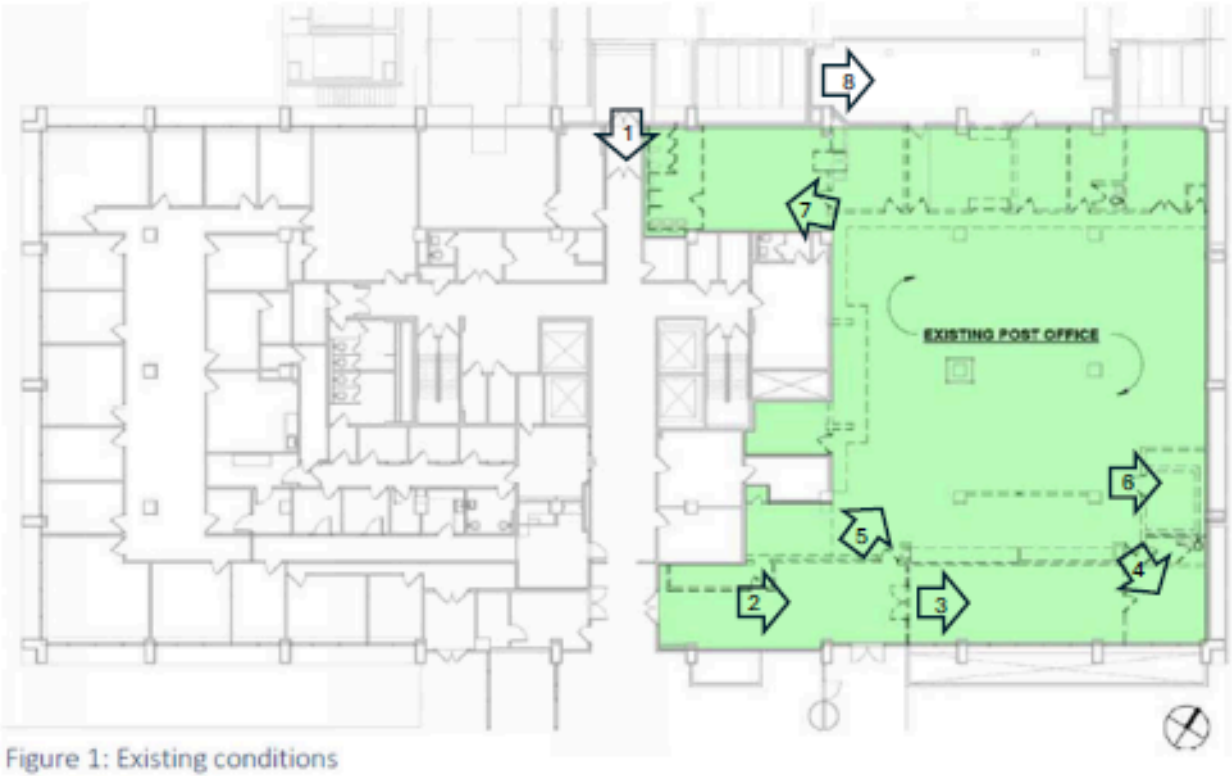


Figure 1: Existing conditions

Map with Photo Locations

Attachment 2
Photos

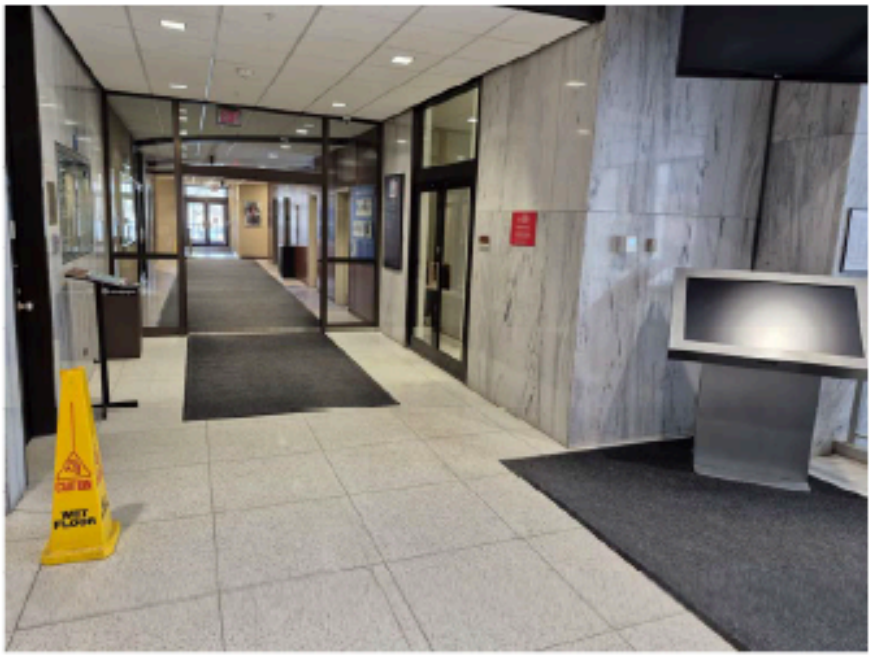


Photo 1: Kenneth B. Keating Federal Building Main Hallway and Lobby (To remain)



Photo 2: Former Post Office Lobby

Attachment 2
Photos



Photo 3: Hallway



Photo 4: Office

Attachment 2
Photos

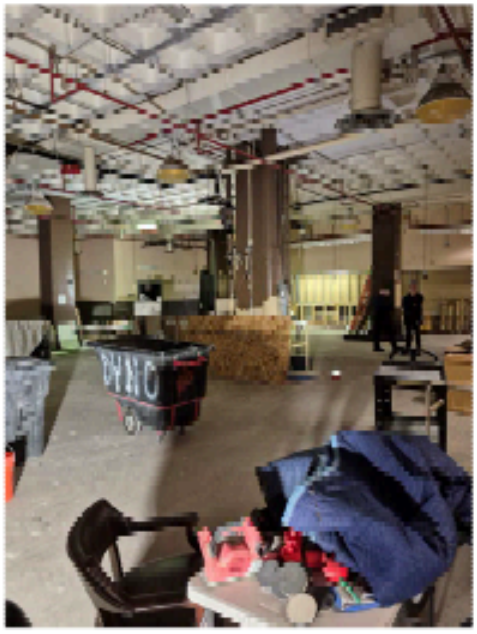


Photo 5: Former Post Office

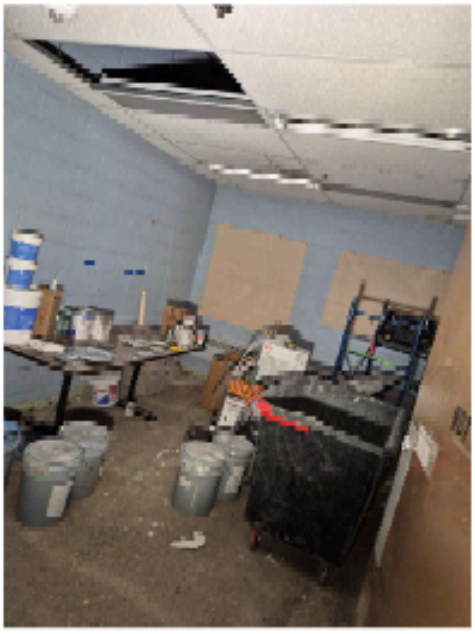


Photo 6: Work Area



Photo 7: Work Area



Photo 8: Loading Dock

Attachment 3
Plans

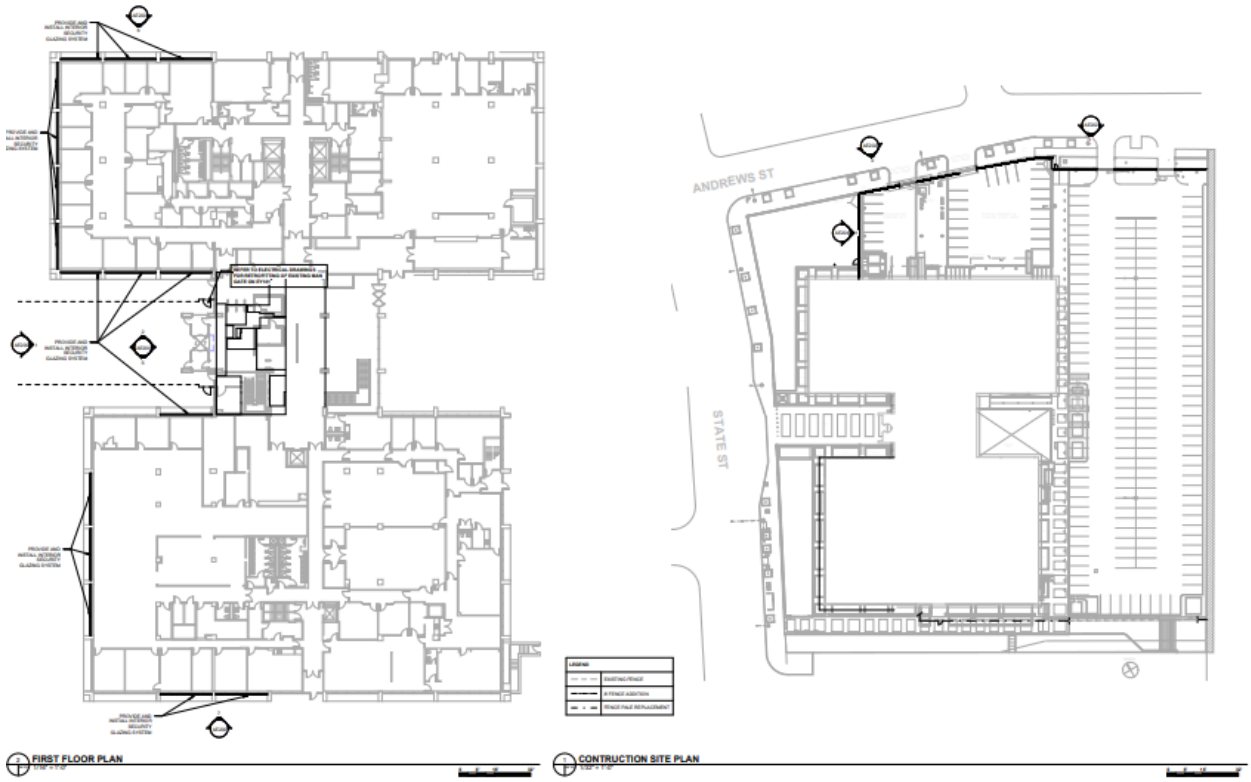


Image: Interior Glazing and Fencing Plans

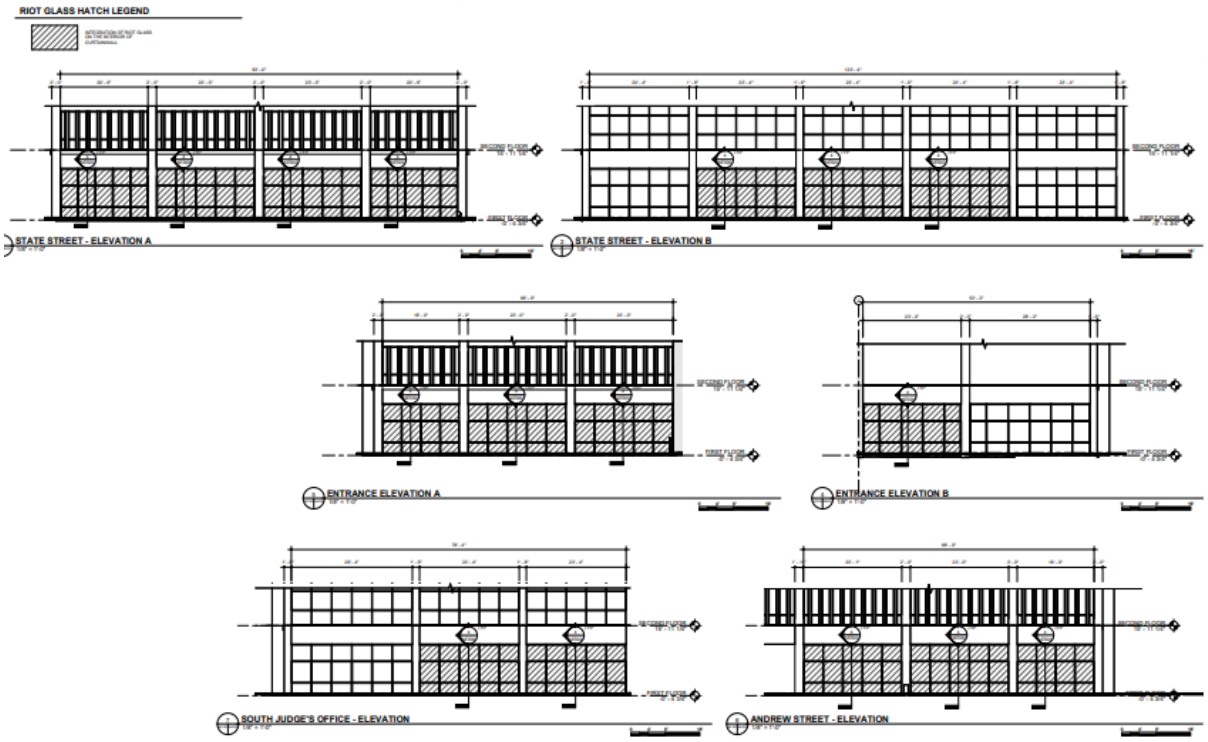
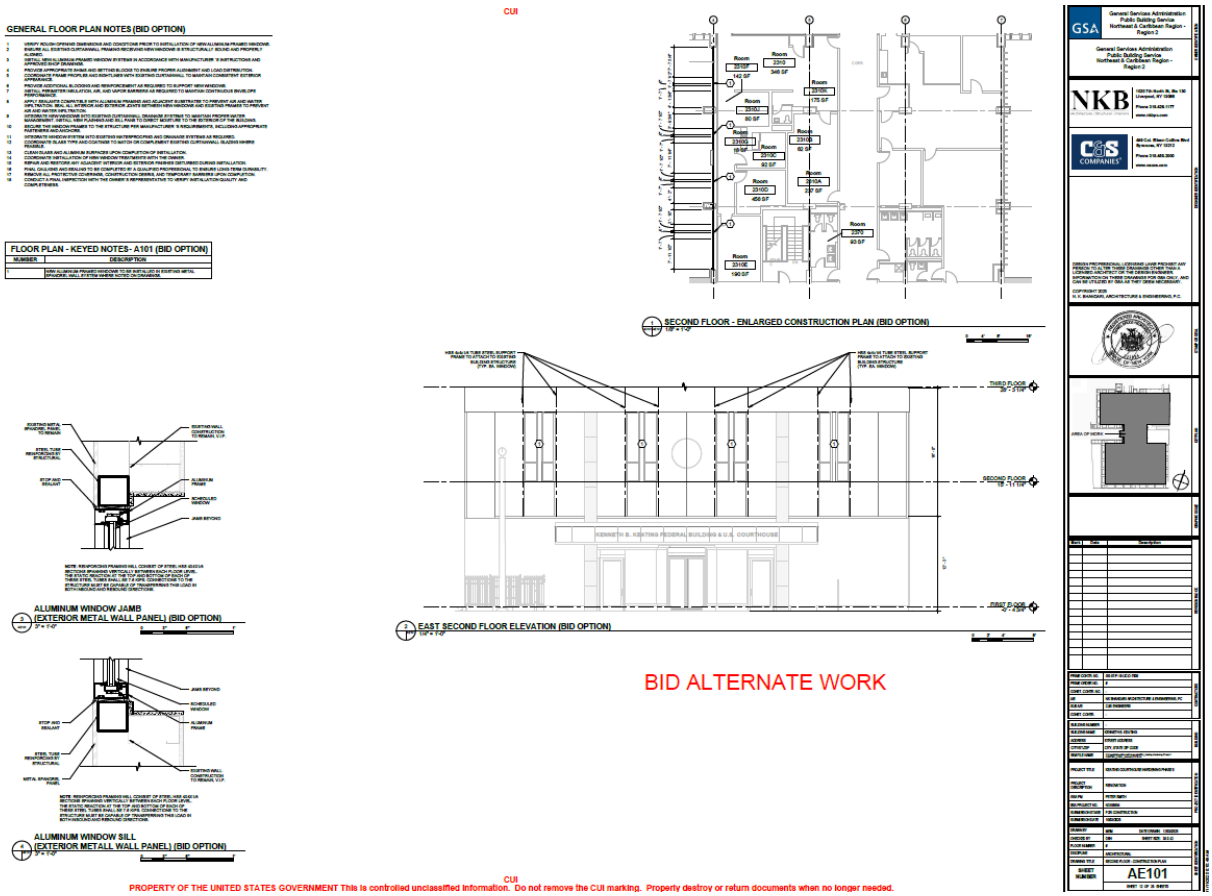


Image: Locations for interior installation of riot glass



CUI

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Image: Installation of 4 New Windows

Attachment 4
Data Sheet

FORCED ENTRY

AP-Series AP375 Security



PRODUCT DESCRIPTION

ArmorPlast® (AP-Series) products are manufactured with our industry-leading resins for exceptional forced entry impact resistance.

Years of field experience and laboratory testing has resulted in the AP Series product line. Our premium forced entry barrier satisfies both security and aesthetic requirements.

High optical clarity and shatter resistance ensures that visibility can be maintained for surveillance or visual confirmation, even during a severe attack.

With glass-like transparency, extreme durability, and an extended service life due to our special UV coatings, AP-Series products are the perfect solution for light weight security window and door retrofits.

RIOT GLASS®

SECURITY AND SAFETY GLAZING

AP-Series AP375 sheets are a monolithic polycarbonate that satisfies the requirements of ASTM F 1915, ASTM F 1233, ASTM F 3561, and UL 972. They are suitable for all forced entry and security applications that require resilient, dependable performance.

All AP-Series polycarbonate products are engineered for high optical clarity. Interior and exterior surfaces have a proprietary AR hard coat that facilitates cleaning and resists marring, chemical attack, and graffiti.

AP375 has a (7) year Limited Product Warranty against coating failure, yellowing, and hazing.

TYPICAL PROPERTIES

THICKNESS	**0.375" ± 5%**	**SHADING COEFFICIENT**	**0.92**
WEIGHT	**2.3 LBS/SQ FT**	**LIGHT TRANSMISSION**	**88%**
U-VALUE	**0.84**		

RATINGS

FORCED ENTRY & CONTAINMENT

- **With USF Surface Mount Framing**
  - ASTM F 1233-08 Class 2.8
- **With USF Full Framing**
  - ASTM F 1233-08 Class 2.8
  - ASTM F 3561 Level 8
- **ASTM F 1915 Grade 3**
- **H.P. White TP 0500 Level 1 Seq 8**
- **UL 972: Burglary Resistant Glazing Materials**

COMPLIANCE CERTS

- ANSI Z97.1 Safety Glazing
- CPSC 16 CFR 1201 CAT I and II
- UL 746C: Sustainability for Outdoor Use
- AAMA 501.8: Resistance to Human Impact

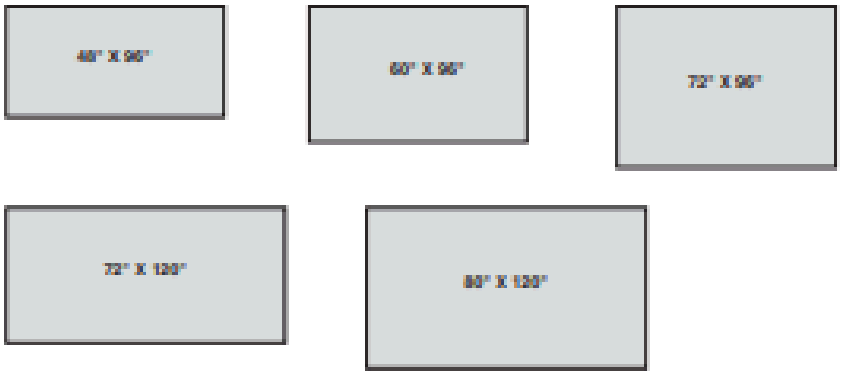
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AP-Series Polycarbonate Security Panels

GLAZING RECOMMENDATIONS

- Structural security framing systems with equal or greater forced entry and/or ballistics ratings to the selected AP-Series security are recommended.
- AP-Series panels should be sized to allow for a minimum of one 3/4" edge engagement in the frame.
- Use wet or dry sealants compatible polycarbonates.
- Remove protective masking after glazing operations are completed and before prolonged exposure to direct sunlight, moisture or high temperature.

STANDARD STOCK SIZES*



* Additional Sizes may be available upon special request.

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Buyer acknowledges although components of the Riot Glass, LLC products may contain specific ratings, including ballistics-grade products, such tests were performed in laboratory conditions, in a controlled environment, and only related as a specific component of the overall system. Buyer acknowledges Buyer is purchasing an installed system comprising of multiple components which have been rated, tested, or approved for varying performance levels including ballistics, or fitness of a particular purpose, including but not limited to preventing intrusion by any or limited means. Furthermore, neither Riot Glass, LLC nor its Authorized Dealers can guarantee the installed system will provide the necessary protection to Buyer's property due to the variance of the environment from laboratory conditions. Riot Glass, LLC specifically disclaims any implied warranties, including fitness for a particular purpose and merchantability, and advises Buyer to conduct its own research to determine the best solution for Buyer's unique situation.

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